

COHEN & GREEN

October 11, 2022

Hon. Ona T. Wang
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Wang:

My firm, with co-counsel, represents Plaintiff in the case named above. I write, jointly with Defendants, to request an adjournment of the conference currently scheduled for October 13, in person, for the reasons — and on the conditions — described below.

Defendants have made a partial motion to dismiss, and Defendants have stated they intend to move to stay all discovery pending that motion. From Plaintiff's perspective, the most time sensitive discovery is identification — and joinder — of John and Jane Doe Defendants. The parties have met and conferred and agreed that if Defendants can identify and consent to joinder of the Does, Plaintiff will consent to stay all other discovery pending the motion to dismiss.

On those conditions, then, the parties jointly ask that the Court enter an order: (1) adjourning the initial pre-trial conference (and related filing deadlines) *sine die* until resolution of Defendants' current motion; (2) staying discovery except for Doe-related matters for the same period; and (3) directing Defendants to identify the Doe Defendants described in the First Amended Complaint (*see, e.g.*, Dkt. No. 29 ¶¶ 12, 13, 33-34, 37-38, 53-54, 60-61) by October 28, 2022, and allowing Plaintiff to file a Second Amended Complaint joining those parties within 5 business days thereafter.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

Attorneys for Plaintiff

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc:

All relevant parties by electronic filing.